

United States District Court

for the
Western District of New York

United States of America

v.

Case No. 24-mj-1193

TREVOR KNAPP

Defendant

AMENDED CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the dates listed below, in the Western District of New York, the defendant, TREVOR KNAPP:

- (1) on or about November 30, 2021, the exact date being unknown, did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been shipped and transported using any means and facility of interstate and foreign commerce, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer; and
- (2) on or about October 10, 2024, did knowingly possess any material that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and that were produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer;

all in violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and 2252A(a)(5)(B).

This Criminal Complaint is based on these facts:

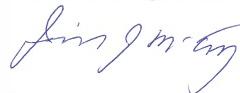
- Continued on the attached sheet.



Complainant's signature

Eric M. Schmidt, Task Force Officer, FBI

Printed name and title



Judge's signature

Sworn to before me and signed telephonically.

Date: October 11, 2024

City and State: Buffalo, New York

HON. JEREMIAH J. MCCARTHY, USMJ

Printed name and title

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Eric M. Schmidt, being duly sworn, depose and say:

1. I am a Task Force Officer of the Federal Bureau of Investigation and have been on the Child Exploitation Task Force (CETF) since April 2017. I have been employed as a police officer with the Town of Tonawanda Police Department since January 2002. As a member of the CETF, I work on cases associated with the Violent Crimes Against Children program, which targets individuals involved in the online sexual exploitation of children. As part of these duties, I have become involved in the investigation of suspected violations of Title 18, United States Code, Sections 2251, 2252, 2252A, 2422, and 2423. I have also participated in various FBI mandated and volunteer training for the investigation and enforcement of federal child pornography laws in which computers and electronic media are used as the means for receiving, transmitting, and storing child pornography.

2. I make this affidavit in support of an Amended Criminal Complaint charging **TREVOR KNAPP** (“KNAPP”), with a date of birth in October 1991 with distribution and possession of child pornography, in violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and 2252A(a)(5)(B).

3. The statements contained in this affidavit are based on my involvement in this investigation, as well as information provided to me by other law enforcement officers involved in this investigation, and upon my training and experience. Because this affidavit is being submitted for the limited purpose of seeking a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts

that I believe are necessary to establish probable cause to believe that KNAPP violated Title 18, United States Code, Sections 2252A(a)(2)(A) and 2252A(a)(5)(B).

4. On April 23, 2024, a 17-year-old minor female with a date of birth of February 2007 (hereinafter “MINOR VICTIM 1”), contacted the Flagstaff Police Department (FPD), Flagstaff, Arizona, in regards to harassment by a 32-year-old male that was occurring online. FPD Officer Brant Chapin took the initial police report and spoke with MINOR VICTIM 1 and her mother, PARENT 1 at MINOR VICTIM 1’s school. MINOR VICTIM 1 advised that a male by the name of Trevor KNAPP had been messaging her. MINOR VICTIM 1 explained that she met KNAPP on a website called, “mylol”, a friend finding website that she no longer uses. MINOR VICTIM 1 and KNAPP began talking when MINOR VICTIM 1 was 12 or 13 years old. The conversations became sexual in nature and KNAPP would masturbate while the two would video chat. KNAPP masturbated during the video chat multiple times. When MINOR VICTIM 1 was 14 years old, KNAPP would ask for naked images of her. She advised Officer Chapin that she did not send any naked images or videos but that she would get out of the shower naked while the two were video chatting and KNAPP would screen capture an image of her naked. At one point in the relationship, KNAPP advised that he was 30 years old. The two messaged through Google Chat also and KNAPP would utilize multiple Google email accounts. MINOR VICTIM 1 would delete or block KNAPP and he would utilize a new account to regain contact. MINOR VICTIM 1 would be uncomfortable with how KNAPP was talking. KNAPP also located MINOR VICTIM 1’s Instagram account and would message her on that platform as well. MINOR VICTIM 1 advised KNAPP multiple times of her real age, including this most recent time. MINOR VICTIM 1 showed Officer Chapin screen captures of a conversation that she had with

KNAPP on Instagram, where his account name is “idekwhat2dohere” and hers was a particular account hereinafter “Victim Instagram Account”. KNAPP has also sent videos of himself ejaculating to MINOR VICTIM, who has been requesting for the past eight months for him to leave her alone. MINOR VICTIM 1 told KNAPP that she was dating another male, and KNAPP requested images of MINOR VICTIM 1 and her boyfriend having sex. MINOR VICTIM 1 also advised that KNAPP told her that he lived in New York State and that he recently told her he wanted to visit her in Arizona as he knew she moved from Colorado. MINOR VICTIM 1 was also able to explain what KNAPP looked like, adding that KNAPP would only show half of his face when the two would video chat. KNAPP was described as a white male, black hair, beard, overweight, and approximately 6-foot 4-inches tall. MINOR VICTIM 1 also believed that KNAPP’s birthday is October XX, but was unsure of his year of birth.

5. On April 23, 2024, Flagstaff Police Detective Jesse Schafer was assigned as the detective for their investigation. On that same date, Detective Schafer sent a preservation request to Meta Platforms, Inc. for Instagram accounts, “idekwhat2dohere” and Victim Instagram Account.

6. On April 24, 2024, Flagstaff Police Officer Chapin responded to MINOR VICTIM 1’s school again and was advised by MINOR VICTIM 1 that KNAPP was messaging her once again. MINOR VICTIM 1 advised that on April 23, 2024, she had gotten home from school and had turned her cellular device back on and had received email notifications from KNAPP and he was asking her why she blocked him. KNAPP told MINOR VICTIM 1 that he was “okay being friends” and that he was still attracted to her.

KNAPP also sent an image of his penis. MINOR VICTIM 1 also advised Officer Chapin that KNAPP had created more email accounts to communicate with her, including “yareyousuchacoward@gmail.com” and “kljj54810@gmail.com”. The “kljj” email was the one he utilized to send am image of his penis. Officer Chapin advised MINOR VICTIM 1 to delete her email address and change her Instagram profile name.

7. On July 10, 2024, Detective Schafer contacted PARENT 1 who advised him that MINOR VICTIM 1 was still being extorted for child pornography. PARENT 1 believed that KNAPP was the same individual who she had filed a police report on in Broomfield, Colorado on October 16, 2020. That report was later turned over to the U.S. Department of Homeland Security for follow up, however, PARENT 1 has never heard from that agency regarding that investigation. Detective Schafer spoke with PARENT 1 and MINOR VICTIM 1, who recounted the story of how KNAPP began engaging in sexual conversations with MINOR VICTIM 1 beginning in 2020 when she was 13 years old. MINOR VICTIM 1 advised Detective Schafer that the website, “mylol” was what she referred to as a “pedophile Zoom”. KNAPP advised initially that he was 16 years old and asked MINOR VICTIM 1 if she was okay talking to older people. MINOR VICTIM 1 further advised that their conversations continued on Google Chat, Instagram, and Skype. During the video chats, KNAPP would tell MINOR VICTIM 1 that she was pretty. MINOR VICTIM 1 told Detective Schafer that she would send “stuff” to KNAPP and that as time went on she would send more images and videos to other people as well. MINOR VICTIM 1 also advised that KNAPP told her on Instagram that every adult male in her life wanted to “fuck” her. Those types of statements made MINOR VICTIM 1 very upset and affected her psychologically. MINOR VICTIM 1 also informed Detective Schafer that she had also been on Instagram and

had looked at other girls that KNAPP was following on his account. She did recognize another female, MINOR VICTIM 2 that he was following because he had sent MINOR VICTIM 1 naked images of her in the past. MINOR VICTIM 1 then contacted MINOR VICTIM 2 via video chat. MINOR VICTIM 2 told MINOR VICTIM 1 that she was 17 years old and that KNAPP had been communicating with her since she was 13 years old. MINOR VICTIM 2 also told MINOR VICTIM 1 that KNAPP had travelled to her city, purchased gifts for her such as a laptop, and also sexually assaulted her as well. MINOR VICTIM 1 did agree to a child forensic interview at the request of Detective Schafer.

8. Also on July 10, 2024, MINOR VICTIM 1 was brought by PARENT 1 to the Safe Child Center, Flagstaff, AZ, for a forensic interview with Child and Adolescent Forensic Interviewer (CAFI) Jami Molloy. MINOR VICTIM 1 did disclose to CAFI Molloy that she was sexually assaulted by a classmate while living in Colorado. MINOR VICTIM 1 advised that she met KNAPP on the mobile application, “mylol” as she was looking for friends. MINOR VICTIM 1 told the CAFI that KNAPP advised her that he was 16 years old and she advised him that he was older than she was. The two moved the conversation to Google Chat. The two then utilized the mobile application “Whereby” that MINOR VICTIM 1 described as an application where you could video call another person, she also referred to it as a “Pedophile Zoom” application. MINOR VICTIM 1 advised that a person did not need an account for “Whereby”. During one of their video chats on “Whereby” KNAPP asked MINOR VICTIM 1 if she, “wanted to see something.” KNAPP turned on his camera and was masturbating, which MINOR VICTIM 1 stated that it “freaked her out.” The two continued to converse and at one point, KNAPP advised MINOR VICTIM 1 that he was actually 19 years old. MINOR VICTIM 1 advised him that he was 6 years older than she

was. KNAPP asked MINOR VICTIM 1 not to leave the conversation. MINOR VICTIM 1 advised the CAFI that she began to have feelings for KNAPP. At another point, KNAPP asked MINOR VICTIM 1 if she had an account on “Instagram.” She told him that she did not but he was able to find a different Instagram account for her and got upset with her for what he believed was her lying to him. KNAPP asked MINOR VICTIM 1 to get on the phone. He then requested that she remove her shirt and expose her breasts to him, which she complied with. KNAPP then took a screen shot of her exposed breasts, and began blackmailing her for more naked images and videos of her. MINOR VICTIM 1 complied with KNAPP requests since she was fearful of the images and videos being leaked. She described feeling lonely and hurt by KNAPP. MINOR VICTIM 1 also advised that her mother did find out about the naked images and videos she was sending and got upset also.

9. After MINOR VICTIM 1 started high school, KNAPP told her that he thought that her teachers “want to fuck you.” He also told her that he would want to be her step-dad and “fuck” her also. MINOR VICTIM discovered that KNAPP was not 19 years old and was really 28 years old. He became upset and sent her one of her images. She confronted him and asked him to delete the image. At another point, KNAPP created another Google account in the name of a female and began accusing MINOR VICTIM 1 of dating KNAPP. KNAPP later admitted that he was the one behind the account, because he wanted to see if MINOR VICTIM 1 cared about him. After MINOR VICTIM 1 began dating someone she went to school with, KNAPP offered to pay her money for videos of her and her boyfriend having sex, he also called her a “whore” and a “slut.” MINOR VICTIM 1 cut communication with KNAPP and he began to reach out on other Google accounts that had names like “youareacoward” and “gofuckyourself”. MINOR VICTIM 1 also told the CAFI

that KNAPP later sent her a nude image of another female, MINOR VICTIM 2. MINOR VICTIM 1 and MINOR VICTIM 2 began communicating, and MINOR VICTIM 2 described SUBJECT as “the pedophile”. MINOR VICTIM 2 told MINOR VICTIM 1 that she was 17 years old and lived in Pennsylvania. MINOR VICTIM 1 and MINOR VICTIM 2 began video chatting and discussing KNAPP. MINOR VICTIM 2 told MINOR VICTIM 1 that KNAPP showed up to her neighborhood. MINOR VICTIM 2 further advised that KNAPP had sexual intercourse with her and bought her a computer. MINOR VICTIM 1 advised that KNAPP continued to reach out to her and demanding naked images and videos from her. He also offered again to pay her for the images and videos. MINOR VICTIM 1 also described a video that KNAPP sent to her showing him masturbating to a naked image of her on his tablet. KNAPP was using the image on the tablet to masturbate and using another device to record the masturbation. MINOR VICTIM 1 was able to provide one Google email account of KNAPP’s to CAFI, “pottyputter05@gmail.com”.

10. After the Forensic Interview, MINOR VICTIM 1 was able to provide Detective Schafer with multiple other accounts that KNAPP was utilizing and had multiple sexually explicit images and videos of her saved in. She provided two Google email accounts she used and believed that KNAPP’s main Google account was “pottyputter05” and that he would have sexually explicit images of her on that account. MINOR VICTIM 1 stated that as soon as she would block KNAPP on one account he would text her from another in the Google Chat function. Other Google email accounts used by KNAPP were, “kljj54810”; “outoftime686”; “chargebacks107”; “trevorinjo”; “1finalconfession”; “wellshy” and “yareyousuchacoward”. MINOR VICTIM sent Det. Schafer multiple screen shots from the Google Chat where she told KNAPP to stop communicating with her and he would send

images of his erect penis. KNAPP told MINOR VICTIM 1 that he knew she lived in Flagstaff, AZ and that he was going to come and meet her. MINOR VICTIM 1 again advised Det. Schafer that KNAPP had sent her a video of him masturbating and ejaculating to a nude image of her that she sent several years prior. MINOR VICTIM 1 also told Det. Schafer that when KNAPP found out that she had communicated with MINOR VICTIM 2, he sent her another sexually explicit image of herself that she sent to him when she was 14 years old and threatened her by saying that he no longer had a reason to keep the image to himself. MINOR VICTIM 1 described the image as a paused video that show an adult sex toy over a vagina. MINOR VICTIM 1 advised that the particular image KNAPP sent her was from the Google Gmail account, “kljj54810”.

11. Detective Schafer then authored search warrants for all of the above listed Google email accounts. The search warrant was signed by County of Coconino Judge Steinlage on July 10, 2024. The warrant was returned on August 7, 2024. Detective Schafer reported that the “pottyputter05”; “kljj54810”; and “talkjust39” accounts were all accessed from the same Samsung model SM-S918U device bearing IMEI #: 358849564246047. Detective Schafer was able to find further information within the “pottyputter05” account that related to “Trevor Knapp” with an address in Tonawanda, New York (“Subject Premises”). Detective Schafer was also able to identify “Trevor Knapp” as being born on October XX, 1991.

12. Detective Schafer also found emails within the “pottyputter05” Gmail account from PayPal where KNAPP had paid MINOR VICTIM 1 varying amounts of money from \$5.00 to \$140.00. Detective Schafer located one email that showed an \$80.00 transaction

from KNAPP to MINOR VICTIM 1 that had a message, “Make ur dance special, I very much hope you legitimately do want me.” Another email from the same day showed another transaction for \$50.00 with a message, “I really hope you suck dick for me and fucked when ur period is done.” Detective Schafer also found communications and transactions from KNAPP to another unknown individual, possible another minor victim.

13. Detective Schafer also authored a search warrant for several Instagram accounts, including Victim Instagram Account and “idekwhat2dohere”. The search warrant was signed by County of Coconino Judge Fridlund-Horne on July 10, 2024. The search warrant return was dated August 7, 2024, and contained conversations of a sexual nature between MINOR VICTIM 1’s account and “idekwhat2dohere” which is KNAPP’s account.

14. Later, on August 7, 2024, Detective Schafer authored a search warrant for PayPal to produce records for users identified as “pottyputter05@gmail.com” and for MINOR VICTIM 1’s account, and another account for the possible third minor victim. The search warrant was signed by County of Coconino Judge Nichols. The search warrant was returned on August 8, 2024. Detective Schafer was able to determine that the “pottyputter05@gmail.com” email had opened multiple PayPal accounts that belonged to “Trevor Knapp” at the Subject Premises.

15. Detective Schafer was also able to ascertain that MINOR VICTIM 1 had also communicated with KNAPP on other Google email accounts, including the account “findsomethings703” used by KNAPP. Detective Schafer reviewed one of MINOR VICTIM 1’s email account and observed her being threatened by the “nomorechasingyou” Google account. That user, believed to also be KNAPP, was threatening to have her

accounts closed and have her blacklisted if she did not unblock him and apologize.

16. On or about August 13, 2024, Detective Schafer contacted your affiant and requested assistance in this investigation as KNAPP lives in the Western District of New York. Detective Schafer was able to forward the police reports, search warrants, search warrant return data, and other documentation pertinent to the investigation.

17. Your affiant did watch the CAFI interview of MINOR VICTIM 1 from July 10, 2024. It should be noted that MINOR VICTIM 1 has a birthmark on the inside of her upper right arm that was visible in the CAFI interview.

18. Your affiant also reviewed the search warrant return data for the Google accounts. In Google account “foundsomething703” which was used by KNAPP, a video was located within the Google Chat folder. The video titled “File-20211130_123311.mp4” is 1 minute and 1 second in length. The video depicts a digital tablet resting on a red and white colored blanket. There is a male masturbating to the image on the tablet which is MINOR VICTIM 1 as the birthmark on the inside of her right arm is clearly visible. MINOR VICTIM 1 is completely naked and kneeling in the image with her vagina exposed. The male masturbating to the tablet then ejaculates on the tablet at the end of the video. This is the same video described as being sent to MINOR VICTIM 1 during her CAFI interview. It is believed that the file title for this video includes the date the video was created, November 30, 2021, as MINOR VICTIM 1 would have been 14 years old at the time and in the video she appears to be 14 years old. Based on my training and experience, this video depicts child pornography as defined by Federal Law.

19. Your affiant also reviewed the PayPal search warrant return data for the “pottyputter05@gmail.com” account and the MINOR VICTIM 1’s account. Your affiant located the following transactions on MINOR VICTIM 1’s account:

- January 27, 2024 at 16:23 GMT: \$80.00 US Dollars from “pottyputter05@gmail.com” containing a note that reads, “Make ur dance special, I very much hope you legitimately do want me”
- January 27, 2024 at 18:16 GMT: \$50.00 US Dollars from “pottyputter05@gmail.com” containing a note that reads, “I really hope you suck dick for me and get fucked when ur period is done”
- The Counterparty name in all transactions shown on MINOR VICTIM 1’s Paypal account is “Trevor Knapp” and the account number for the counterparty is 2109280290XXXXX7743 for several transactions. There is another counterparty account number, 5433319931XXXXX9946 also with the name “Trevor Knapp”.

In looking at the search warrant return data for PayPal account 2109280290XXXXX7743, The account is in the name of Trevor Knapp at the Subject Premises, DOB: 10/XX/1991, mobile phone number 716-XX-9852, social security number XXX-XX-5435, account creation date 12/21/2015. The devices listed in the PayPal return show a Samsung SM-S918U as of March 10, 2024. The login activity for the account shows multiple IP addresses, including 69.204.26.93, which resolves to Charter Communications.

20. Your affiant also reviewed the Instagram search warrant results. Located within “idekwhat2dohere” account is a conversation with “itsdonnii_” which was formerly “theyfw.ambr”. An excerpt of that conversation is as follows:

2024-03-15 18:57:01 UTC

idekwhat2dohere: I'd rather have just talked about you getting bent over still
lol

MV1 Account: Ya I never expected as much

idekwhat2dohere: didn't get bent over first of all
lol well then what did you do

MV1 Account: other stuff

idekwhat2dohere: So NOW you're gonna be shy about it eh

MV1 Account: Are you gonna apologize for cussing at me?

idekwhat2dohere: Are you gonna take video of it to make up for what you
didn't send me?

21. On September 6, 2024, an administrative subpoena was sent to Verizon Wireless for subscriber information related to telephone number 716-XXX-9852 from January 1, 2023, through September 5, 2024. On October 4, 2024, Verizon responded by advising that the telephone number was no longer subscribed through their service and was subscribed through Tracfone between January 23, 2021, and January 5, 2024. That number is currently being subscribed through Charter Communications. On October 8, 2024, an administrative subpoena was sent to Charter Communications for subscriber information related to telephone number 716-XXX-9852. As of this affidavit the subpoena information has not been returned by Charter Communications. Verizon also provided Device ID information for 716-XXX-9852 and shows that effective January 5, 2024, the device assigned to that number is a Samsung SM-S918U, bearing IMEI number 358849564246047.

22. Also on September 6, 2024, an administrative was sent to Charter Communications for IP address 69.204.26.93 for the dates of 11/06/2023 at 1:25:00PM GMT; 01/27/2024 at 7:34:00PM GMT; 05/03/2024 at 1:00PM GMT and 05/15/2024 at 4:29:00PM GMT. On September 11, 2024, Charter Communications responded with the following information:

- Subscriber Name: ARTHUR KNAPP
- Service Address: Subject Premises
- Phone Number: 315XXX5651

23. Between September 3, 2024, and September 5, 2024, research into New York State Department of Motor Vehicles showed that Trevor J. Knapp, DOB: 10/XX/1991, SSN: XXX-XX-5435; Arthur Knapp, DOB: 08/XX/1956, and Cindy Lou Knapp, DOB: 03/XX/1955, all reside at the Subject Premises.

24. On October 4, 2024, your affiant spoke with Detective Schafer who was calling to inquire about the status of this investigation and to provide further information. Just prior to speaking with your affiant, Detective Schafer advised that he spoke with MINOR VICTIM 1 who called him upset, to inform him that she was receiving new Google Chat messages from yet another Gmail account that KNAPP was now using. KNAPP was texting MINOR VICTIM 1 and stating things to the effect of “instead of being enemies, lets be friends,” and “I can pay you money for more pictures and videos of you.” MINOR VICTIM 1 was advised to send the chat messages via a link that Detective Schafer provided. Detective Schafer advised that he would forward the chat messages to me upon receipt, however he was going to be out of the office for the next few days.

25. On October 9, 2024, a search warrants for the Subject Premises and KNAPP were authorized by United States Magistrate Judge Jeremiah J. McCarthy in the Western District of New York.

26. On October 10, 2024, your affiant and Federal Agents of the FBI-Buffalo

executed the search warrants for the Subject Premises and KNAPP. The Samsung SM-S918U cellular device bearing IMEI: 358849564246047 was located and seized on the person of KNAPP who did provide biometric fingerprint and facial recognition to unlock the device. Your affiant conducted a brief search of the device and located within the photo application on the phone was the video of MINOR VICTIM 1 referenced above, File-20211130_123311.mp4, which is a video of a male masturbating to an image of MINOR VICTIM 1 displayed on a tablet in which she is completely naked and kneeling in the image with her vagina exposed.

27. Based upon the foregoing, I respectfully submit that I have probable cause to believe that **TREVOR KNAPP** has violated Title 18, United States Code, Sections 2252A(a)(2)(A) and 2252A(a)(5)(B).



ERIC M. SCHMIDT, Task Force Officer
Federal Bureau of Investigation

Sworn and subscribed telephonically
this 11th day of October 2024.



HON. JEREMIAH J. MCCARTHY
United States Magistrate Judge